UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No. 05CV 11841 NG

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)
NEW CINGULAR WIRELESS PCS LLC,   )
                                    Plaintiff,   )
        v.   )
)
TOWN OF NORTH ANDOVER, MASSACHUSETTS,   )
BOARD OF APPEALS of the TOWN OF NORTH   )
ANDOVER, ELLEN McINTYRE, RICHARD J. BYERS,   )
ALBERT P. MANZI III, JOSEPH D. LaGRASSE,   )
DAVID R. WEBSTER, DANIEL S. BRAESE,   )
THOMAS D. IPPOLITO, RICHARD M. VAILLANCOURT,)
as they are members and associate members of the Board,)
and PLANNING BOARD OF NORTH ANDOVER, and   )
Richard Nardella, John Simons, Richard Rowen, Alberto   )
Angles, and Jack Green, as they are members and associate)
members of the North Andover Planning Board,   )
                                    Defendants.   )
_____)

JOINT MOTION TO RESCHEDULE THE DATE FOR FILING THE RECORD

The plaintiff, New Cingular Wireless PCS, LLC ("Cingular") and the defendants, Town

of North Andover, et al. ("Town"), move that the Court extend the date for the filing of the

Administrative Record from August 28, 2006 to September 11, 2006.

As grounds for this motion, the parties state:

The current scheduling order requires the Town to file the Administrative Record by

August 28, 2006. There is a status conference on August 29, 2006. The Town has not yet filed

the Administrative Record, believing that the matter was likely to be settled, thereby saving the

Town the substantial cost of the preparation and copying of the Record. The parties are working

on an Agreement for Judgment to resolve this case. Therefore, the parties have decided to ask the

Court to extend the above deadline, each side reserving all rights in the event that the case does

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not settle.

THE PLAINTIFF,   THE DEFENDANTS,
By its Attorney,   By their Attorneys,

___/s/_Stephen D. Anderson_____   ___/s/ Thomas J. Urbelis_____
Stephen D. Anderson, BBO #018700   Thomas J. Urbelis
Douglas H. Wilkins, BBO #528000   Urbelis & Fieldsteel, L.L.P
Scott Lacy, BBO #633323   155 Federal Street
Anderson & Kreiger LLP   Boston, Massachusetts 02110
43 Thorndike Street   617-338-2200
Cambridge MA 02141
617-252-6575
  Dated: August 25, 2006

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